



U.S. Borax Inc.
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The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
2000

September 29,

To Whom It May Concern:

Enclosed please find completed applications for the "National Environmental Performance Track" for our four (4) facilities, all of which are located in California.

Should you have any questions or require amplification to any of the responses please contact Gerald Pepper at (661) 287-5788.

Sincerely,

Gerald Pepper
Manager, Environmental Affairs

cc: Elaine Dorward-King

A09-0020



**National
Environmental
Achievement Track**

Application Form

U.S. Borax Inc. - Wilmington Operations
Name of facility

Rio Tinto Limited
Name of parent company (if any)

300 Falcon Street
Street address

Street address (continued)

Wilmington, CA 90744
City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Gerald M. Pepper

Title Manager, Environmental Affairs

Phone (661) 287-5788

Fax (661) 287-5566

E-mail gerry.pepper@borax.com

Gerald M. Pepper
11-9-00

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Bulk Loading and Manufacturing of Borates and Boron-containing compounds

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2819

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

CAD000630020

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

Checklist Attached

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Facility has been ISO 14001 registered since December, 1998.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Discharges of chemical to water and soil	Unquantifiable	Leakage	0 leakage	
<p>i. How is the current level an improvement over the previous level?</p> <p>We have identified that the cement berms supporting our Sulfuric Acid tanks, has been eroded over the years, we were concerned that the sulfuric acid could make its way down through the old concrete to the soil and any ground water under the storage tanks.</p> <p>To be proactive and prevent a significant release we proceeded to install new concrete flooring with chemical resistant epoxy liners to help maintain the integrity of the new flooring to prevent the sulfuric acid from leaching into the environment.</p> <p>ii. How did you achieve this improvement?</p> <p>Invest money and time into replacing the concrete base of the storage tanks and applying a chemical resistant epoxy based coating to the storage berms.</p>				

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?													
	Quantity See Below	Units	Quantity See Below	Units												
Emissions of NOX																
<p>i. How is the current level an improvement over the previous level?</p> <p>We replaced a number of our Dryers and burners with Low NOx burners</p> <table style="width: 100%; margin-left: 40px;"> <thead> <tr> <th style="width: 40%;"></th> <th style="width: 30%;">OLD BURNER</th> <th style="width: 30%;">LOW NOx Burner</th> </tr> </thead> <tbody> <tr> <td>BOILER 7</td> <td>47.75 Lbs Nox/MMCF</td> <td>10 lbs NOX/ MMCF</td> </tr> <tr> <td>Spray Dryer</td> <td>130 lbs NOx/MMCF</td> <td>20 lbs NOx/MMCF</td> </tr> <tr> <td>SQ Dryers (2)</td> <td>130 lbs NOx/MMCF</td> <td>15 lbs NOx/MMCF</td> </tr> </tbody> </table> <p>ii. How did you achieve this improvement?</p> <p>Install low NOX burners - Investment of Money. Note - we did not have to install these units as we have plenty of NOX emission credits without the Low NOx burners.</p>						OLD BURNER	LOW NOx Burner	BOILER 7	47.75 Lbs Nox/MMCF	10 lbs NOX/ MMCF	Spray Dryer	130 lbs NOx/MMCF	20 lbs NOx/MMCF	SQ Dryers (2)	130 lbs NOx/MMCF	15 lbs NOx/MMCF
	OLD BURNER	LOW NOx Burner														
BOILER 7	47.75 Lbs Nox/MMCF	10 lbs NOX/ MMCF														
Spray Dryer	130 lbs NOx/MMCF	20 lbs NOx/MMCF														
SQ Dryers (2)	130 lbs NOx/MMCF	15 lbs NOx/MMCF														

2. Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Hazardous Solid Wastes
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:
Absolute value (Quantity/Units)

☒ Option B:
In terms of
units of production
or output 17.73 Tons
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

13.2 tons
(Quantity/Units)

e. How will you achieve this improvement?

Try to find ways of either recycling the material back through our process systems, or finding alternate means for use (off-spec market - different markets)

Second aspect you've selected

a. What is the aspect?

Emission of Fugitive Particulate Matter

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

nquantifiable detectable
emissions
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

reduced visible emissions
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

The quantity of dust generated during ship loading is not easily quantifiable - but detectable. We were being proactive concerning the small amounts of dust generated during the bulk loading of ships. We have identified 3 belts that contribute to this generation, thus we have replaced these 3 belts with fully enclosed conveying belts. We have noticed a decrease in the amount of dust during ship loading. We will continue to look for ways to continually control the dust generated during ship loading.

Third aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

e. How will you achieve this improvement?

Accidental Releases

☐ Yes ☒ No

☒ Option A:
Absolute value 2
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

☒ Option A:
Absolute value 0
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

We are modifying our aqua ammonia system and our city sewer system to ensure the prevention of uncontrolled discharges. For the ammonia system, we have replaced our old non-pressurized tank with a new pressurized system that will not need to vent ammonia vapors to a scrubbing system but rather will retain them inside the vessel. We are also installing automatic actuator valves in our city effluent system so that any time the pH of our wastewater stream goes out of a specified range, it will close all valves to the city and route all the water to our holding tank system.

Fourth aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Total Energy Use

☐ Yes ☒ No

☐ Option A:
Absolute value (Quantity/Units)

☒ Option B:
In terms of
units of production
or output 965945 Kilowatt
Hours/Month
(Quantity/Units)

☐ Option A:
Absolute value (Quantity/Units)

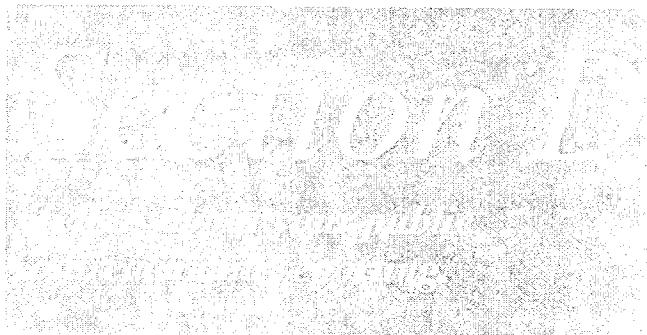
☒ Option B:
In terms of
units of production
or output 96594 Kilowatt
Hours/month
(Quantity/Units)

e. How will you achieve this improvement?

We are going to be looking at how to make our use of energy more efficient. We are currently working with the local energy department to do an energy usage study of the facility. We will evaluate running high energy users during the off shifts to use less energy during the city's high demand times. We will also be looking at changing the electricity rating of systems throughout the plant. Evaluate if we can install better capacitors, circuits, lights, etc.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

If the community requests to see any of our environmental policies or programs, they are given a complete copy to evaluate and ask any questions about.

2 How do you inform community members of important matters that affect them?

Although we have never had to inform the public of any environmental issues, we would probably inform the general public by utilizing the media (newspapers, and evening news).

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www.borax.com

☒ Newspaper

☐ Open Houses

☒ Other

Display the achievement in the facility for visitors to see.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Harbor Association of Industry and Commerce	Ray Delrich	(310) 417-3929
<i>State/Local Regulator</i>	California Regional Water Quality Control Board	Dan Radulescu	(213) 576-6668
<i>Other community/local reference</i>	Port of Los Angeles	Julia Nagano	(310) 732-3503

Section E

Application and Participation Statement.

On behalf of Wilmington Operations
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Gerald Pepper
11/16/00

Printed Name/Title

Joseph A. Carrabba
Chief Operations Officer

Gerald Pepper
Manager, Environmental Affairs

Facility Name

U.S. Borax Wilmington Operations

Facility Street Address

300 Falcon Street, Wilmington, CA 90744

Facility ID Numbers

CAD000630020

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name U.S. Borax Inc. - Wilmington Operations
Facility Location: 300 Falcon Street, Wilmington, CA 90744
Facility ID Number(s): CAD000630020
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

13. South Coast Air Quality Management District Regulations
- 14.

<input checked="" type="checkbox"/>
<input type="checkbox"/>

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste
 - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. ☐
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. CUPA License ☒
- 7. Los Angeles City Fire Department Regulations - Tank Storage, etc. ☒

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐

- | | |
|---|-------------------------------------|
| 4. Solid Waste Storage and Removal Requirements | <input type="checkbox"/> |
| 5. Disposal Requirements for Special Wastes | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- | | |
|----|--------------------------|
| 6. | <input type="checkbox"/> |
| 7. | <input type="checkbox"/> |

Water Pollution Control Requirements

- | | |
|---|-------------------------------------|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) | <input checked="" type="checkbox"/> |
| 2. Designation of Hazardous Substances (40 CFR 116) | <input checked="" type="checkbox"/> |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) | <input checked="" type="checkbox"/> |
| 4. NPDES Permit Requirements (40 CFR 122) | <input checked="" type="checkbox"/> |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129) | <input type="checkbox"/> |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) | <input type="checkbox"/> |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) | <input type="checkbox"/> |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) | <input type="checkbox"/> |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) | <input type="checkbox"/> |
| 10. Water Quality Standards | <input checked="" type="checkbox"/> |
| 11. Effluent Limitations for Direct Dischargers | <input checked="" type="checkbox"/> |
| 12. Permit Monitoring/Reporting Requirements | <input checked="" type="checkbox"/> |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | <input type="checkbox"/> |
| 14. Collection, Handling, Processing of Sewage Sludge | <input type="checkbox"/> |
| 15. Oil Discharge Containment, Control and Cleanup | <input type="checkbox"/> |
| 16. Standards Applicable to Indirect Discharges (Pretreatment) | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- | | |
|---|-------------------------------------|
| 17. Los Angeles City Bureau of Sanitation Regulations/Permits | <input checked="" type="checkbox"/> |
| 18. | <input type="checkbox"/> |

Drinking Water Regulations

- | | |
|--|--------------------------|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | <input type="checkbox"/> |
| 2. National Primary Drinking Water Standards (40 CFR 141) | <input type="checkbox"/> |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) | <input type="checkbox"/> |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources | <input type="checkbox"/> |
| 5. Underground Injection Control Requirements | <input type="checkbox"/> |

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐
☐

2. RCRA Corrective Action (identify)

☐
☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

3.

☐

4.

☐